United States Courts
Southern District of Texas
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FEB 0 4 2025

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

NORTEK MEDICAL STAFFING, INC. *Plaintiff*,

Nathan Ochsner, Clerk of Court

VS.

CIVIL ACTION NO. 4:24-CV-03354

JELLICO REGIONAL HOSPITAL, LLC, MISSION HEALTH PARTNERS, LLC, MISSION RURAL PARTNERS, LLC, PROGRESSIVE HEALTHCARE SOLUTIONS, LLC Defendants.

UNNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER

Defendant, Progressive Health Group, LLC, a Mississippi limited liability company (improperly named in the above-caption), *pro se*, respectfully requests an order granting defendant an additional thirty (30) days in which to move, plead, or otherwise respond to the Plaintiff's Complaint.

We hereby show good cause as we need additional time to finalize our legal representation in Texas for this matter. Once counsel has been retained, said counsel will need sufficient time to properly respond to the allegations in Plaintiff's Complaint.

Plaintiff's counsel has been properly notified of this request, and Plaintiff's counsel does not object to this request.

Respectfully submitted on, this the 31st day of January, 2025.

PROGRESSIVE HEALTH GROUP, LLC

By:

Quentin Whitwell

Pro Se

265 N. Lamar Blvd., Suite C

Oxford, MS 38655

(662) 701-9346

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. In addition, I emailed a courtesy copy to the counsels of record in this matter.

Respectfully submitted,

PROGRESSIVE HEALTH GROUP, LLC

By:

Quentin Whitwell

Pro Se

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